

BOIES SCHILLER FLEXNER LLP

David Boies (admitted *pro hac vice*)
333 Main Street
Armonk, NY 10504
Tel: (914) 749-8200
dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165
Beko Reblitz-Richardson, CA Bar No. 238027
Erika Nyborg-Burch, CA Bar No. 342125
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
mmao@bsfllp.com
brichardson@bsfllp.com
enyborg-burch@bsfllp.com

James Lee (admitted *pro hac vice*)
Rossana Baeza (admitted *pro hac vice*)
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
jlee@bsfllp.com
rbaeza@bsfllp.com

Alison L. Anderson, CA Bar No. 275334
725 S Figueroa St., 31st Floor
Los Angeles, CA 90017
Tel.: (213) 995-5720
alanderson@bsfllp.com

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander Frawley (admitted *pro hac vice*)
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 789-3100
abonn@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
711 Van Ness Ave, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913
mram@forthepeople.com

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
GOOGLE'S MATERIAL SHOULD BE
SEALED**

CIVIL L.R. 79-5

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed.

Document or Portion of Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Portions highlighted in yellow of Plaintiffs' Response to Google's Motion to Exclude Opinions of Plaintiffs' Damages Expert Michael J. Lasinski	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
Excerpts of the transcript of the June 30, 2022 deposition of Sabine Borsay, attached as Exhibit 1 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
Excerpts of the transcript of the August 16, 2022 deposition of On Amir, attached as Exhibit 3 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
A document labeled GOOG-CABR-04324934, attached as Exhibit 4 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
Excerpts from the May 24, 2022 deposition of Troy Walker, attached as Exhibit 5 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
A document labeled GOOG-CABR-04820567, attached as Exhibit 6 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
Excerpts from the March 10, 2022 deposition of Sonal Singhal, attached as Exhibit 7 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
Excerpts from the rough transcript of the August 18, 2022 deposition of Bruce Strombom, attached as Exhibit 8 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
A document labeled GOOG-CABR-04010128, attached as Exhibit 9 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
A document labeled GOOG-BRWN-00230425, attached as Exhibit 10 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order

1 2 3	Excerpts from the transcript of the August 2, 2022 deposition of Steven Weisbrot, attached as Exhibit 11 to the Lee Declaration	Google	Contains Material Designated "Highly Confidential" by Google pursuant to the Protective Order
-------------	---	--------	---

4 Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of
5 establishing that the designated material is sealable.

6 Dated: August 19, 2022

Respectfully submitted,

7 By: /s/ John A. Yanchunis

8 **MORGAN & MORGAN**

John A. Yanchunis (admitted *pro hac vice*)

Ryan J. McGee (admitted *pro hac vice*)

201 N. Franklin Street, 7th Floor

Tampa, FL 33602

Tel.: (813) 223-5505

jyanchunis@forthepeople.com

rmcgee@forthepeople.com

13 Michael F. Ram, CA Bar No. 104805

711 Van Ness Ave, Suite 500

San Francisco, CA 94102

Tel: (415) 358-6913

mram@forthepeople.com

16 **BOIES SCHILLER FLEXNER LLP**

David Boies (admitted *pro hac vice*)

333 Main Street

Armonk, NY 10504

Tel: (914) 749-8200

dboies@bsfllp.com

20 Mark C. Mao (CA Bar No. 236165)

mmao@bsfllp.com

Beko Reblitz-Richardson (CA Bar No. 238027)

brichardson@bsfllp.com

Erika Nyborg-Burch (CA Bar No. 342125)

enyborg-burch@bsfllp.com

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

Tel.: (415) 293 6858

Fax: (415) 999 9695

26 James Lee (admitted *pro hac vice*)

jlee@bsfllp.com

Rossana Baeza (admitted *pro hac vice*)

1 rbaeza@bsflp.com
100 SE 2nd Street, Suite 2800
2 Miami, FL 33131
Tel.: (305) 539-8400
3 Fax: (305) 539-1307

4 Alison L. Anderson (CA Bar No. 275334)
alanderson@bsflp.com
5 725 S. Figueroa Street, 31st Floor
6 Los Angeles, CA 90017
Tel.: (213) 629-9040

7
8 **SUSMAN GODFREY L.L.P.**

Bill Carmody (admitted *pro hac vice*)
9 Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
10 Alexander Frawley (admitted *pro hac vice*)
1301 Avenue of the Americas, 32nd Floor
11 New York, NY 10019
Tel.: (212) 336-8330
12 bcarmody@susmangodfrey.com
13 srabin@susmangodfrey.com
sshepard@susmangodfrey.com
14 afrawley@susmangodfrey.com

15 Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
16 Los Angeles, CA 90067
Tel: (310) 789-3100
17 abonn@susmangodfrey.com

18 **Attorneys for Plaintiffs**
19
20
21
22
23
24
25
26
27
28